

# McKool Smith

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March 14, 2024

By ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2270  
New York, New York 10007

Re: Stein and Lhote v. Skatteforvaltningen  
23 Civ. 2508 (NRB)

Dear Judge Buchwald:

We write on behalf of Plaintiffs-Counterclaim Defendants Matthew Stein and Jerome Lhote and jointly with counsel for Counterclaim Defendant Luke McGee.

We respectfully request that the Court permit Stein, Lhote, and McGee until Tuesday, March 19, 2024, to submit to the Court a request under the Hague Convention to obtain overseas evidence.

The parties had proposed via Stipulation and Proposed Order (ECF No. 91) that the last day to seek to have the Court authorize a Hague Convention request be March 13, 2024. The Court has not yet entered the Proposed Order.

We seek two additional business days beyond the date agreed to by the parties in order to properly determine the nature and scope of the Hague Convention request to be sought from the Court. Preparing this material has been more time-consuming than anticipated and has involved, among other things, coordination with counsel in Denmark.

We sought the consent of Defendant-Counterclaim Plaintiff Skatteforvaltningen to extend the time set out in the parties' Stipulation from Wednesday, March 13, through Tuesday, March 19.

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The Honorable Naomi Reice Buchwald  
March 14, 2024  
Page 2

SKAT agreed to extend the date from Wednesday, March 13, until Friday, March 15, but was unwilling to consent to extending the date until Tuesday, March 19. They were unwilling to provide any explanation of why extending the deadline agreed to by the parties by two business days was agreeable, but that extending the deadline by four business days was not.

Stein, Lhote, and McGee make this request in good faith and submit that SKAT would not be prejudiced by this extremely short extension of the deadline agreed to by the parties.

Counsel for Stein, Lhote, and McGee are available to discuss their request at the Court's convenience.

Respectfully submitted,

/s/

Daniel W. Levy

cc: All Counsel (by ECF)

The deadline for Stein, Lhote, and McGee to request that the Court authorize a Hague Convention request shall be March 19, 2024.

SO ORDERED.

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NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Date: March \_\_\_\_, 2024  
New York, New York